

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

DANIEL MILLER,

Plaintiff,

v.

ARAMARK HEALTHCARE SUPPORT
SERVICES, INC., a domestic corporation,
and ARAMARK CLINICAL TECHNOLOGY
SERVICES, INC., a domestic corporation, and
ARAMARK MANAGEMENT SERVICES
LIMITED PARTNERSHIP,

Defendants.

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C.A. No. 06-534 MPT

PLAINTIFF'S FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS
DIRECTED TO EACH NAMED DEFENDANT

COMES NOW Plaintiff, by and through his attorneys, Schmittinger & Rodriguez, P.A., and requests Defendants to produce for examination and copying at the offices of Schmittinger & Rodriguez, P.A., 414 S. State Street, Dover, Delaware 19901, on or before thirty (30) days from the date of receipt of this request, the following items:

1. Copies of all submitted Clinical Repair Technicians' Paid Time Off (PTO) requests from June 1, 2004, through April 15, 2005, with evidence of its denial or approval and department attendance on such requested dates for PTO.

RESPONSE:

2. All work order requests including, but not limited to, initial inspections, repair orders, preventative maintenance inspections and on-call responses for Plaintiff for the time period of February 2, 2005 through April 15, 2005.

RESPONSE:

3. All work orders and initial inspections that are referenced in each disciplinary write-

up for Plaintiff from January 1, 2005 through April 15, 2005.

RESPONSE:

4. Records of any computer user name changes after April 1, 2005 for the user name Daniel Miller, using his password that had been established prior to this, which can be acquired from the information technology center for Aramark Healthcare Division in Charlotte, North Carolina.

RESPONSE:

5. Schedules of Clinical Technician job assignments from July 1, 2004 through October 1, 2005, including, but not limited to, the sheets that were distributed to the technicians that stated the name, location and duties encompassed for each month by each technician.

RESPONSE:

6. The complete equipment data file of the following equipment:
- a. Asset/control number 847980;
 - b. Asset/control number 848019;
 - c. Asset/control number 826053;
 - d. Asset/control number 469907;
 - e. Asset/control number 848018;
 - f. Marquette/ GE Cardiac Assisted Stress Exerciser (CASE) system located at Milford Memorial Hospital Cardiology department;
 - g. Both Marquette/ GE Cardiac Assisted Stress Exerciser (CASE) systems located at Kent General Hospital Cardiology department.

RESPONSE:

7. Documentation of all preventative maintenance inspections performed by John

Ritterhoff from March 1, 2005, to April 15, 2005.

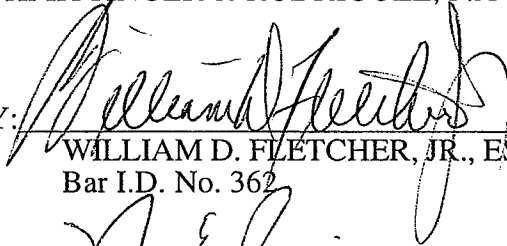
RESPONSE:

8. All documents referenced or used to answer the question to Plaintiff's Third Set of Interrogatories Directed to Each Named Defendant.

RESPONSE:

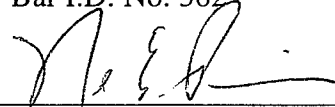
SCHMITTINGER & RODRIGUEZ, P.A

BY:



WILLIAM D. FLETCHER, JR., ESQ.
Bar I.D. No. 362

BY:



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Attorneys for Plaintiff

DATED: 2/28/08
/ljo